

Office of Environmental Health Hazard Assessment



Winston H. Hickox
Agency Secretary

Joan E. Denton, Ph.D., Director

Headquarters • 1001 I Street • Sacramento, California 95814

Mailing Address: P.O. Box 4010 • Sacramento, California 95812-4010

Oakland Office • Mailing Address: 1515 Clay Street, 16th Floor • Oakland, California 94612



Gray Davis
Governor

MEMORANDUM

TO: Charles M. Andrews, Chief
Worker Health and Safety Branch
Department of Pesticide Regulation
P.O. Box 4015
Sacramento, California 95812-4015

FROM: Anna M. Fan, Ph.D., Chief
Pesticide and Environmental Toxicology Section

DATE: September 19, 2001

SUBJECT: REQUEST FOR CONCURRENCE WITH AN EMERGENCY REGULATION
FOR METHYL BROMIDE FIELD FUMIGATION

Robert E. Gooding for Anna Fan

Today the Office of Environmental Health Hazard Assessment (OEHHHA) received a request from the Department of Pesticide Regulation (DPR) for immediate concurrence with proposed emergency regulations for methyl bromide field fumigation, which amend Sections 6450.2(e) and 6450.3(a)(1)(C)2.

We have reviewed the proposed changes and offer concurrence with the proposed emergency regulations. However, we have public health concerns that the regulations appear to be too broad, since every roadway, highway, or other means of travel is generally exempted from the buffer zone restrictions. This general exemption might create a significant hazard for the public on certain roadways under certain conditions. OEHHHA believes greater specificity regarding which public roads should be exempted in California can be provided. For example, if Interstate Highway 5 is the roadway of concern, then we believe that this roadway should be specified in the regulations. Alternately, if the intent is to have certain types of roadways exempted, then the regulations could state that the only roadways exempt from the buffer zone restrictions are those with a speed limit of 55 miles per hour or greater.

Thank you for the opportunity to review and provide our concurrence on these emergency regulations. However, we need to meet with you to discuss specific changes in the proposed text to alleviate our public health concerns in future regulations on methyl bromide. Please call me or Dr. Richard Ames at (510) 622-3200 to let us know when you would be available.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption.



Printed on Recycled Paper

Charles M. Andrews, Chief

Page 2

cc: Val F. Siebal
Chief Deputy Director
Office of Environmental Health Hazard Assessment

George V. Alexeeff, Ph.D., D.A.B.T.
Deputy Director for Scientific Affairs
Office of Environmental Health Hazard Assessment

Richard Ames, Ph.D., M.P.H., Chief
Pesticide Epidemiology Unit
Pesticide and Environmental Toxicology Section
Office of Environmental Health Hazard Assessment

Charles M. Andrews, Chief

Page 3

bcc: Robert Haas, Ph.D
Pesticide Epidemiology Unit
Pesticide and Environmental Toxicology Section
Office of Environmental Health Hazard Assessment

Michael J. DiBartolomeis, Ph.D., D.A.B.T., Chief
Pesticide and Food Toxicology Unit
Pesticide and Environmental Toxicology Section
Office of Environmental Health Hazard Assessment